

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

**FILED**

DEC 19 2023

UNITED STATES OF AMERICA

v.

AZELL CANTY  
QUENTIN WILLIAMS  
TEMORRIS CAMPBELL  
DOROTHY ABRAHAM  
LUIS TOVAR

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Criminal No. 2:23-278  
(18 U.S.C. § 1349)  
[UNDER SEAL]

CLERK U.S. DISTRICT COURT  
WEST. DIST. OF PENNSYLVANIA

**INDICTMENT**

**COUNT ONE**

The grand jury charges:

**THE CONSPIRACY AND ITS OBJECTS**

1. From in and around June 2021, and continuing thereafter to in and around March 2023, in the Western District of Pennsylvania and elsewhere, the defendants, AZELL CANTY, QUENTIN WILLIAMS, TEMORRIS CAMPBELL, DOROTHY ABRAHAM, and LUIS TOVAR, and other individuals known and unknown to the grand jury, knowingly and voluntarily did conspire, combine, confederate and agree with each other to commit Bank Fraud, in violation of 18 U.S.C. § 1344(1).

**OBJECT OF THE CONSPIRACY**

2. It was the object of the conspiracy to defraud federally insured financial institutions of money under their custody and control.

**MANNER AND MEANS OF THE CONSPIRACY**

3. It was part of the conspiracy that members of the conspiracy stole or otherwise fraudulently obtained the personally identifying information, including the names and social security numbers, of customers at federally insured financial institutions (hereinafter, the "victim customers").

4. It was further part of the conspiracy that members of the conspiracy recruited individuals, including the defendants, DOROTHY ABRAHAM and LUIS TOVAR, who would impersonate the victim customers while cashing counterfeit checks at federally insured financial institutions.

5. It was further part of the conspiracy that members of the conspiracy stole and otherwise fraudulently obtained valid checks, drawn on the accounts of victim businesses, entities, and individuals (hereinafter, the "victim account holders") at federally insured financial institutions.

6. It was further part of the conspiracy that members of the conspiracy used the stolen and fraudulently obtained checks to create counterfeit checks, drawing on the accounts of the victim account holders. These counterfeit checks were designed to resemble valid checks of the victim account holders but were made payable to one of the victim customers.

7. It was further part of the conspiracy that members of the conspiracy, including the defendants, AZELL CANTY, QUENTIN WILLIAMS, and TEMORRIS CAMPBELL, caused counterfeit checks and fraudulent identification documents to be provided to the check-cashers, including the defendants, DOROTHY ABRAHAM and LUIS TOVAR. The fraudulent identification documents included forged drivers' licenses using the names of the victim customers but the faces of the check-cashers, including DOROTHY ABRAHAM and LUIS TOVAR.

8. It was further part of the conspiracy that members of the conspiracy, including the defendants, AZELL CANTY, QUENTIN WILLIAMS, and TEMORRIS CAMPBELL, coordinated the activities of the check-cashers, including the defendants, DOROTHY ABRAHAM and LUIS TOVAR. This coordination included reserving lodging and rental cars in locations where counterfeit checks would be passed, and driving check-cashers, including the defendants,

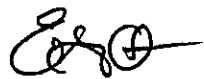
DOROTHY ABRAHAM and LUIS TOVAR, to branches of federally insured financial institutions. As a result of this coordination, counterfeit checks were presented in states including Arizona, Arkansas, Colorado, Connecticut, Kansas, Minnesota, New Hampshire, North Carolina, Oklahoma, Pennsylvania, South Carolina, West Virginia, and Wisconsin.

9. It was further part of the conspiracy that members of the conspiracy, including the defendants, DOROTHY ABRAHAM and LUIS TOVAR, cashed the counterfeit checks at branches of federally insured financial institutions while impersonating the victim customers, in exchange for a share of the proceeds.

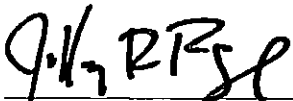
10. It was further part of the conspiracy that members of the conspiracy, including the defendants, AZELL CANTY, QUENTIN WILLIAMS, TEMORRIS CAMPBELL, DOROTHY ABRAHAM, and LUIS TOVAR, shared proceeds of the counterfeit checks among themselves.

All in violation of Title 18, United States Code, Section 1349.

A True Bill,

  
FOREPERSON

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